

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

JAMIE SCATENA, a single woman,
Plaintiff,

v.

UNITED AIR LINES, INC., *et al.*,
Defendants.

Case No. C09-1429RSL

STIPULATED MOTION TO EXTEND
DEADLINES

MARC SHANNON, *et al.*,
Plaintiffs,

v.

UNITED AIRLINES, INC. *et al.*,
Defendants.

Plaintiffs Jamie Scatena, Marc Shannon and Kim Shannon, Defendants United Airlines and UAL Corporation, and Defendant Airbus Americas, Inc., respectfully request an order extending this Court's initial scheduling order deadlines by ninety days. Counsel have conferred and agree that an additional extension of these deadlines may facilitate settlement of these claims.

STIPULATED ORDER TO EXTEND DEADLINES – 1

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I. FACTUAL BACKGROUND

1 The Court has previously entered an Order consolidating the two separate cases filed
2 by the Plaintiffs individually and extending the initial deadlines. That Order was entered by
3 the Court on December 2, 2009. At that time it was believed by Plaintiffs that both were
4 nearing the end of their medical treatment and therefore the case may be appropriate for
5 settlement discussions within sixty to ninety days. Although one of the Plaintiffs, Ms.
6 Scatena, did complete her medical treatment, Mr. Shannon has not yet, although it appears he
7 is close.
8

9 On Friday, February 19, 2009, counsel for Plaintiffs and the United Airlines
10 Defendants conferred and agreed to file a stipulated motion to request an additional ninety
11 day extension of the initial deadlines due to the fact that they had not yet been able to
12 participate in a FRCP 26(f) conference that included all parties, and due to the fact that Mr.
13 Shannon was nearing the end of his medical treatment. Unfortunately, due to staffing
14 complications, counsel were unable to get the stipulated motion e-filed by the close of
15 business on February 19.
16

17 Coincidentally, at approximately 5:40 pm on Friday, February 19, counsel received e-
18 mail notification that counsel had appeared for Airbus Americas, Inc. Counsel for that
19 defendant has now been contacted and joins in this motion.
20

II. REQUEST FOR EXTENSION

21 The parties are therefore respectfully requesting that the Court grant an additional
22 ninety day extension of the Court's scheduling order deadlines so that all parties can be
23 served and participate in the FRCP 26(f) conference and potential settlement discussions,
24 thereby resulting in increased efficiencies to the parties and conservation of judicial resources.
25
26

1 The parties request that the Court extend the deadlines in the Order Regarding Initial
2 Disclosures, Joint Status Report, and Early Settlement, Dkt. 9, as amended in the Court's
3 Order Granting Motion to Consolidated and to Extend Initial Deadlines dated December 2,
4 2009, as follows:

5 Deadline for FRCP 26(f) Conference: May 20, 2010

6 Initial Disclosures Due: May 27, 2010

7 Joint Status Report/Discovery Plan: June 10, 2010

8 Respectfully submitted this 19th day of February, 2010
9

10 KRUTCH, LINDELL, BINGHAM,
11 JONES & PETRIE, P.S.
12 Attorneys for Plaintiff

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